

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

<b>VASHON WOOLRIDGE,</b>	)	
	)	
<b>Plaintiff,</b>	)	<b>Case No. 08-C-3374</b>
	)	
<b>v.</b>	)	<b>Judge Kocoras</b>
	)	
<b>P.O. JOSEPHINE CHRISTOPHER,</b>	)	<b>Magistrate Judge Cox</b>
<b>STAR #5974, individually;</b>	)	
<b>P.O. JOSE ALVAREZ,</b>	)	<b>Jury Demand</b>
<b>STAR #13055, individually; and,</b>	)	
<b>THE CITY OF CHICAGO,</b>	)	
	)	
<b>Defendants.</b>	)	

**THIRD AMENDED COMPLAINT**

Now comes, the Plaintiff, Vashon Woolridge, by and through his attorneys, Gregory E. Kulis & Associates, Ltd., and complaining against the Defendants, P.O. Josephine Christopher, Star #5974, individually; P.O. Jose Alvarez, Star #13055, individually; and the City of Chicago, states as follows:

**COUNT I – FALSE ARREST**

- 1) This action is brought pursuant to the laws of the United States Constitution, specifically, 42 U.S.C. §1983 and §1988, and the laws of the State of Illinois, to redress deprivations of the Civil Rights of the Plaintiff and accomplished by acts and/or omissions of the Defendants committed under color of law.
- 2) Jurisdiction is based on Title 28 U.S.C. §1343 and §1331.
- 3) The Plaintiff, Vashon Woolridge, at all relevant times, was a United States citizen and permanent resident of the State of Illinois.
- 4) The Defendants, P.O. Josephine Christopher and P.O. Jose Alvarez, were, at all relevant times, duly appointed police officers of the City of Chicago and, at all relevant times, were acting within their scope of employment and under color of law.

5) The Defendant, City of Chicago, was and is at all relevant times a municipal corporation duly incorporated under the laws of the State of Illinois, and is the employer and principal of Defendants P.O. Josephine Christopher and P.O. Jose Alvarez.

6) On or about May 26, 2007, the Plaintiff, Vashon Woolridge, was walking down the street in the vicinity of Christiana and Huron in Chicago.

7) The Plaintiff, Vashon Woolridge, was not committing a crime or breaking any laws.

8) The Plaintiff, Vashon Woolridge, was approached by the Defendants, P.O. Josephine Christopher and P.O. Jose Alvarez, who stopped and searched him.

9) The Plaintiff, Vashon Woolridge, has nothing illegal in his possession.

10) The Plaintiff, Vashon Woolridge, had some words with the officers and they arrested him.

11) There was no probable cause for the arrest.

12) Said actions of the Defendants, P.O. Josephine Christopher and P.O. Jose Alvarez, were intentional, willful and wanton.

13) Said actions of the Defendants, P.O. Josephine Christopher and P.O. Jose Alvarez, violated the Plaintiff, Vashon Woolridge's, Fourth Amendment Rights and were in violation of said rights protected by 42 U.S.C. §1983.

14) As a direct and proximate consequence of said conduct of Defendants, P.O. Josephine Christopher and P.O. Jose Alvarez, the Plaintiff, Vashon Woolridge, suffered violations of his constitutional rights, monetary expense, fear, emotional distress, pain and suffering.

Wherefore, the Plaintiff, Vashon Woolridge, prays for judgment against the Defendants, P.O. Josephine Christopher and P.O. Jose Alvarez, jointly and severally, in an amount in excess of Twenty-Five Thousand Dollars (\$25,000.00) in compensatory

damages and Ten Thousand Dollars (\$10,000.00) in punitive damages, plus attorney's fees and costs.

### **COUNT II – MALICIOUS PROSECUTION**

1-11) The Plaintiff, Vashon Woolridge, hereby realleges his allegations of paragraph 3-13 of Count I as his allegations of paragraphs 1-11 of Count II as though fully set forth herein.

12) This matter went to court and was resolved in favor of the Plaintiff.

13) The actions of the Defendants, P.O. Josephine Christopher and P.O. Jose Alvarez, constitute malicious prosecution under Illinois law.

14) As a direct and proximate cause of the actions of the Defendants, P.O. Josephine Christopher and P.O. Jose Alvarez, the Plaintiff, Vashon Woolridge, suffered monetary expense, fear, emotional distress, pain and suffering, and anxiety.

Wherefore, the Plaintiff, Vashon Woolridge, prays for judgment against the Defendants, P.O. Josephine Christopher and P.O. Jose Alvarez, jointly and severally, in an amount in excess of Fifteen Thousand Dollars (\$15,000.00) in compensatory damages and Ten Thousand Dollars (\$10,000.00) in punitive damages, plus attorney's fees and costs.

### **COUNT III- INDEMNIFICATION**

1-11) The Plaintiff, Vashon Woolridge, hereby realleges and incorporates his allegations of paragraphs 1 -14 of Count I and paragraphs 1 -14 of Count II as his respective allegations of paragraphs 1-11 of Count III as though fully set forth herein.

12) Illinois law provides that public entities are directed to pay any tort judgment for compensatory damages for which employees are liable within the scope of their employment activities.

13) Defendants P.O. Josephine Christopher and P.O. Jose Alvarez are employees of the City of Chicago Police Department who acted within the scope of their employment in committing the misconduct described herein.

WHEREFORE, should Defendants P.O. Josephine Christopher and P.O. Jose Alvarez be found liable for the acts alleged above, Defendant City of Chicago would be liable to pay the Plaintiff any judgment obtained against said Defendants.

**JURY DEMAND**

The Plaintiff, Vashon Woolridge, requests a trial by jury.

Respectfully submitted,

Vashon Woolridge,

By: /s/ David S. Lipschultz  
Gregory E. Kulis & Associates, Ltd.

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